

UNITED STATES DISTRICT COURTS  
EASTERN DISTRICT OF TEXAS  
Tyler DIVISION

FILED CLERK  
U.S. DISTRICT COURT  
2012 JUL 23 AM 9:25  
TEXAS EASTERN

Jesse Van Myers  
5222 County Rd. 486  
Tyler, TX 75706  
Name of Plaintiff(s)

Case Number: 6:12cv473  
BY MHS/JKG

vs

Sharon Roy, Tyler ISD  
1319 New Sunnybrook Dr.  
Tyler, TX 75706  
Name of Defendant(s)

COMPLAINT UNDER TITLE VII OF THE CIVIL RIGHTS ACT OF 1964

1. This action is brought pursuant to Title VII of the Civil Rights Act of 1964 for employment discrimination. Jurisdiction is specifically conferred on the court by 42 U.S.C. 2000e-5. Equitable and other relief are also sought under 42 U.S.C. 2000e-5(g).

- 2.. Plaintiff, Jesse Van Myers, is a citizen of the United States  
(name of plaintiff)

and resides at 5222 CR 486, Tyler,  
(street address) (city)

Smith, Texas, 75706, (214) 574-0259  
(county) (state) (zip) (telephone)

- 3.. Defendant, Sharon Ray, Tyler ISD, resides at, or its business is  
(name of defendant)  
located at 1319 New Sunnybrook Dr., Tyler,  
(street address) (city)  
Smith, Texas, 75706, (903) 262-1000  
(county) (state) (zip) (telephone)
4. Plaintiff sought employment from the defendant or was employed by the defendant  
at John Tyler High School, Tyler,  
(street address) (city)  
Smith, Texas, 75702.  
(county) (state) (zip)
5. Defendant discriminated against plaintiff in the manner indicated in paragraphs 9 and 10  
of the complaint on or about January 4, 2011.  
(month, day, year)
6. Plaintiff filed charges against the defendant with the Equal Employment Opportunity  
Commission charging defendant with the acts of discrimination indicated in paragraphs  
9 and 10 of this complaint on or about November 11, 2011.  
(month, day, year)
7. The Equal Employment Commission issued a Notice of Right to Sue which was  
received by plaintiff on May 5, 2012.  
(month day, year)

8. Because of plaintiff's (1) ☒ race, (2) \_\_\_\_\_ color, (3) \_\_\_\_\_ sex,

(4) \_\_\_\_\_ national origin, defendant: (5) ☒ age

a. ☒ failed to employ plaintiff.

b. ☒ terminated plaintiff's employment.

c. \_\_\_\_\_ failed to promote plaintiff.

d. ☒ Other Harassment during and  
after termination

9. The circumstances under which the defendant discriminated against plaintiff were as follows:

All instances are included within the  
attached "COMPLAINT OF DISCRIMINATION".

10. The acts set forth in paragraph 9 of this complaint:
- a. \_\_\_\_\_ are still being committed by defendant.
  - b. \_\_\_\_\_ are no longer being committed by defendant.
  - c. ☒ defendant may still be committing the acts.
11. Plaintiff attaches to this complaint a copy of the charges filed with the Equal Employment Opportunity Commission which charges are submitted as a brief statement of the facts supporting this complaint. WHEREFORE, Plaintiff prays that the Court grant the following relief to the plaintiff:
- a. \_\_\_\_\_ Defendant be directed to employ plaintiff.
  - b. ☒ Defendant be directed to re-employ plaintiff.
  - c. \_\_\_\_\_ Defendant be directed to promote plaintiff.
  - d. ☒ Defendant be directed to pay back wages and that the Court grant such relief as may be appropriate, including injunctive orders, damages, costs and attorney's fees.

  
(Signature of Plaintiff)